

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

BORASETH I. TUM,

CHAPTER 13

CASE NO. 1 - 20 .bk- 00829-HWV

Debtor(s)

JAMIE TUM,

ADVERSARY NO. - ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

BORASETH I. TUM

Nature of Proceeding: Hearing on

Objection to Modify Plan

Defendant(s)/Respondent(s)

Document #: 56, 60 & 61

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Both Debtor's and Objector Jamie Tum's counsel will be out the country on the scheduled hearing date. The parties respectfully request continuance to the December 8 session if possible, as Debtor's counsel will be unavailable on December 22 as well. The Chapter 13 Trustee's Office, who also maintains an objection, has concurred with this request.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 11/8/21

/s/ Tracy L. Updike

Attorney for Jamie Tum

Name: Tracy L. Updike

Phone Number: 717-232-5000

¹ No alterations or interlineations of this document are permitted.